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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

NOV 23 2001

PER 
DEPUTY CLERK

JAMES EDWARD HELLER
PLAINTIFF

) Case No. 1-CV-01-828

) Honorable Judge Yvette Kane

VS.

) Request for the Production
of Documents

JAMES DOHERTY et, al.
DEFENDANTS

PLAINTIFF'S REQUEST FOR THE PRODUCTION OF DOCUMENTS

Pursuant to Rule 34, FED. R. CIV. P., the plaintiff requests that the defendants produce the documents listed herein within 30 days, either by providing the plaintiff with copies or by making them available to the plaintiff for inspection and copying.

1. All grievances, complaints, or other documents received by the defendants, or their agents at MCCF concerning the mistreatment of the plaintiff by the defendants, and any memoranda, investigative files, or other documents created in response to plaintiff's grievances and complaints, from February 21, 2000 to June 27, 2001.

2. All other grievances, requests, or other documents filed by the plaintiff at MCCF from February 21, 2000 to June 27, 2001.

3. Defendants Doherty, Start, Williams, Kessler, and Sofia's written incident reports concerning the incident that occurred on February 28, 2001 at MCCF.

(continued)

4. Any and all grievances, complaints, or other documents received by the defendants or their agents at MCCF concerning the mistreatment of other inmates at MCCF by the defendants or under the supervision of defendant Doherty, and any memoranda, investigative files, or other documents created in response to inmates grievances or complaints since January 1, 1995.

5. Any logs, lists, or other documentation reflecting grievances filed by MCCF inmates from January 1, 1995 to the date of your response.

6. Any and all policies, directives, or instructions to staff concerning the use of force by MCCF staff.

7. The plaintiff's complete medical records from February 21 2000 to June 27, 2001.

8. Any and all documents created by any MCCF staff member in response to a grievance filed by the plaintiff in May of 2001 and June of 2001 concerning his medical care.

9. Any and all policies, directives, or instructions to staff governing to the treatment of inmates after a physical altercation with either inmates or correctional officers.

10. Any and all policies, directives, or instructions to staff governing sick call procedures, both in general population and in segregation.

11. Any and all documents created by any MCCF staff member from February 21, 2000 to June 27, 2001 concerning the plaintiff's medical care and not included in items 7, 8, 9, or 10.

(continued)

By: 

James Edward Heller
Pro se Plaintiff
1600 Waters Mill Rd.
Somerset, PA 15510

Dated: 11/19/01

CERTIFICATE OF SERVICE

I hereby certify that on this day I sent to the Clerk of the Court by U.S. First Class Mail, a true and correct copy of the foregoing request for the production of documents. I requested that the Clerk serve this request on the defendants of record in accordance with 28 U.S.C. §1915(c). These defendants of record are named below:

Gerard geiger, Esq
712 Monroe St.
P.O. Box 511
Stroudsburg, PA 18360-0511

John R. Ninosky, Esq
320 Market St.
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BY: 

James Edward Heller
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1600 Walters Mill Rd
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Dated: 11/19/01